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BEFORE THE ARIZONA CORPORATION COMMISSION

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2013 FEB 20 P 3: 58

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY REQUEST FOR
APPROVAL OF UPDATED GREEN POWER
RATE SCHEDULE GPS-1, GPS-2 AND GPS-3.

) DOCKET NO. E-01345A-10-0394

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION FOR
RESET OF RENEWABLE ENERGY ADJUSTOR.

) DOCKET NO. E-01345A-12-0290

IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY FOR
APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN AND DISTRIBUTED ENERGY
ADMINISTRATIVE PLAN AND REQUEST FOR
RESET OF RENEWABLE ENERGY ADJUSTOR.

) DOCKET NO. E-01933A-12-0296

IN THE MATTER OF THE APPLICATION OF
UNS ELECTRIC, INC. FOR APPROVAL OF ITS
2013 RENEWABLE ENERGY STANDARD
IMPLEMENTATION PLAN AND DISTRIBUTED
ENERGY ADMINISTRATIVE PLAN AND
REQUEST FOR RESET OF RENEWABLE
ENERGY ADJUSTOR

) DOCKET NO. E-04204A-12-0297

Arizona Corporation Commission

DOCKETED

FEB 20 2013

DOCKETED BY

JSN

JOINT REQUEST TO MODIFY PROCEDURAL ORDER

(expedited ruling requested)

1 Arizona Public Service Company ("APS"), Tucson Electric Power Company ("TEP") and
2 UNS Electric, Inc. ("UNSE") (together "Companies") jointly request certain modifications to the
3 Procedural Order issued on February 15, 2013 in these consolidated dockets. Specifically, the
4 Companies request that:

- 5 1. The deadline for publication of notice be extended to March 15, 2013;
- 6 2. The deadline for mailing of notice be extended to April 5, 2013;
- 7 3. The deadline for intervention be extended to April 10, 2013;
- 8 4. The deadline for APS, TEP and UNS direct testimony be extended to March 29,
9 2013;
- 10 5. The deadline for Staff and Intervenor direct testimony be extended to April 24,
11 2013; and
- 12 6. The deadline for rebuttal testimony be extended to May 8, 2013.

13 The Companies also request that they be allowed to identify a location other than the utilities'
14 offices to provide access to the application and subsequent filings in this docket.

15 This request will retain the currently scheduled hearing date but will ameliorate other
16 logistical issues with in the Procedural Order.

17 **A. Notice Issues.**

18 This joint request is based upon the logistics of mailing notice to over 1.1 million APS
19 customers, over 400,000 TEP customers and over 90,000 UNSE customers within the currently
20 allotted time.

21 Mailing notice to customers involves several steps. Once the required notice language is
22 received, it must be converted into an appropriate format for mailing and then printed. Mailing the
23 notice as a bill insert then requires sending the insert with billing statements on a rolling basis over
24 the course of a month. As a practical matter, mailing notice as a bill insert cannot be completed in
25 less than a month of time, and certainly not by March 1st.

26 The Companies believe a bill insert is as effective less costly and at least as timely as a
27 separate mailing. A separate mailing of over 1.5 million pieces is unduly expensive and will take

1 almost as long, if not longer, than a bill insert mailing. For a direct mailing, the Companies would
2 need to (i) order paper and envelopes because they do not keep such quantities in stock; (ii)
3 program and print the insert; and (iii) process the mailings in batches. APS estimates that mailing
4 notice to its 1.1 million customers could cost up to \$400,000. TEP/UNSE estimate that mailing
5 the notice separately would cost approximately \$200,000.¹ These costs are ultimately passed
6 through to the ratepayers. Given that the hearing in this docket is set for late May, the Companies
7 do not believe that it is necessary to incur such expense. Moreover, the Companies cannot
8 complete a separate mailing by March 1st. Indeed, the mailing of the separate notice would take
9 longer than the bill insert process. Once the materials are obtained (which may take some time),
10 the mailings must be addressed and provided to the postal service on a rolling basis because the
11 postal service cannot handle the total volume in a single day. The Companies submit that the
12 alternative bill insert process is reasonable provided that the intervention date is delayed slightly.²

13 The Companies note that, although the issues to be addressed in this proceeding are of
14 importance, they are similar to that of a rulemaking addressing modifications to the REST rules.
15 In a rulemaking, notice is not mailed to customers. Although the Companies believe statewide
16 publication of notice would be sufficient given the nature of this docket, the Companies will
17 provide notice by bill insert.³

18 **B. Testimony Issues.**

19 The Procedural Order requires the Companies to submit written direct testimony and
20 exhibits by March 15, 2013. Other events, however, cause resource constraint challenges. For
21 APS, the concurrent DE Technical Conference will involve three sessions in and around the March
22 15 deadline. DE Technical Conference sessions are scheduled for February 21, March 7 and March
23

24 ¹ For comparison purposes, the cost of a bill insert would run approximately \$20,000-25,000 for
the Companies combined.

25 ² One alternative to bill inserts would be a 250 character bill message that refers the customer to
26 the Companies' website for more information. The website link would include the notice and
27 other pertinent information about the docket. The cost of a bill message would be minimal but
would still require an entire billing cycle to complete

³ The Companies are also proposing a slight delay in the publication deadline.

1 20 and will involve the same renewable energy personnel that are involved in this proceeding. For
2 TEP, the Commission will hold a hearing related to TEP's rate case settlement in the middle of
3 March. Given these overlapping obligations, the Companies request two additional weeks to
4 submit direct testimony, for a new deadline of March 29, 2013.

5 If the Procedural Order is modified to permit the Companies to submit direct testimony on
6 March 29, they propose to additional modifications stemming from that modification. First, the
7 Companies propose extending the deadline for direct testimony from Staff and Intervenors by two
8 weeks, from April 10 to April 24, 2013. Second, the Companies propose extending the deadline
9 for rebuttal testimony one week, from May 1 to May 8, 2013. The Companies do not believe any
10 further modifications in the testimony dates would be needed.

11 **C. Location to View or Obtain a Copy of the Documents.**

12 TEP and UNSE do not have offices at which interested parties may view or obtain the
13 application and subsequent filings in this docket. In other dockets, TEP and UNSE have been
14 authorized to include library locations in their notices in lieu of an office location. TEP and UNSE
15 request the ability to use such a location in this notice.

16 WHEREFORE, The Companies request that the Order modified as follows:


- 17 (i) The deadline for mailing notice through a bill insert (or through a bill message
18 reference) is April 5, 2013;⁴
- 19 (ii) The deadline for publishing notice is March 15, 2013;
- 20 (iii) The notice may contain a location other than the Companies' office as a location to
21 review the application and subsequent filings in this docket;
- 22 (iv) The deadline for intervention is April 15, 2013;
- 23 (v) the deadline for APS, TEP and UNS to submit written direct testimony and exhibits
24 is March 29, 2013; and
- 25
- 26

27 ⁴ This deadline is dependent on resolution of the notice process several days before the
March billing cycle begins.

- 1 (vi) the deadline for Staff and Intervenors to submit written direct testimony and
2 exhibits is April 24, 2013; and
3 (vii) the deadline for rebuttal testimony is May 8, 2013.
4

5 RESPECTFULLY SUBMITTED this 20th day of February 2013.
6


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